

Boone's Estates MHC, LLC  
1091 Mt. Zion Road  
Lothian, MD 20711

February 17, 2021

**VIA ELECTRONIC AND FIRST CLASS MAIL**

(Zolandz.Mark@epa.gov)

Mr. Mark Zolandz  
Enforcement and Compliance Assurance Division  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street (3ED32)  
Philadelphia, PA 19103-2029

**Re: CWA Compliance Inspection Report  
Boone's Estates MHC, LLC (3E21WN002A)  
Issued to Boone's Estates MHC, LLC**

Dear Mr. Zolandz:

This letter and exhibits respond to the U.S. Environmental Protection Agency's ("EPA") February 1, 2021 Compliance Inspection Report (the "Report") issued to Boone's Estates MHC, LLC. EPA requested a response by February 17, 2021. We appreciate the opportunity to provide this response.

The "On-Site Facility Inspection Overview" portion of the Report states that Horizon Land Company, LLC is "defined for the purpose of this report as Discharger." This statement is repeated in the Executive Summary and the Introduction. We do not understand why the Report makes this assertion, as the National Pollutant Discharge Elimination System ("NPDES") permit (the "Permit") for the referenced facility is Boone's Estates MHC, LLC. Accordingly, we do not agree that Horizon Land Company, LLC is properly considered a Discharger and we believe that should be corrected.

EPA made eight (8) observations in the Report, some of which are responded to individually below. For convenience, the numbered observations are reproduced in bold text, followed by our responses. We are available to discuss with EPA the information contained in this letter.

Finally, while we desire to cooperate with EPA in this matter, we must state that nothing in this letter, or the absence of a response with respect to one or more observations, should be construed as an admission of liability, and we reserve all rights to contest any alleged violations or liability in the future. Moreover, nothing provided in response to the Report should be construed as a waiver of any applicable legal privilege, either with

respect to information and/or documents being provided, or with respect to information and/or documents that may be requested or provided in the future.

**OBSERVATION 1: The Plant had 50 effluent limit exceedances from Outfall 001 between November 1, 2015 and October 31, 2020.**

**RESPONSE:** As was discussed during the December 1, 2020 site inspection, Singh Operational Services, Inc. has been retained to operate and maintain the Boone's Estates WWTP following prior operation by other third-party contractors. Mr. Singh indicated his company is making operational improvements at the WWTP, but has more work to do. It is believed that the change in contract operational responsibility will result in enhanced operation and fewer exceedances moving forward.

**OBSERVATION 2: Of the 50 effluent exceedances from Outfall 001, 41 were related to total suspended solids (TSS). The Inspectors observed multiple Plant factors that could contribute to the elevated levels of TSS.**

**OBSERVATION 3: The Inspectors observed foam and scum in the immediate vicinity of Outfall 001 and in the receiving water.**

**OBSERVATION 4: The Inspectors made several observations related to operations and maintenance at the Plant. Most observations were related to solids management throughout the treatment train (refer to Section III, Observation 4).**

**RESPONSE:** In general, Observations 2, 3 and 4 all relate in some manner to solids management and are reflective of conditions at the time of the inspection. Subsequent to the December 1 inspection, our current contract operator identified an organic defoamer that is successfully removing foam from areas of the WWTP. And, as discussed during the inspection, some of the bulking issues are believed attributable to the microorganisms and old sludge. The contract operator has been working to address these issues and we anticipate a demonstrated improvement to solids management. Photographs showing substantially improved conditions in the aeration chamber, the clarifier and the UV disinfection chamber are attached as Exhibit 1.

**OBSERVATION 5: The Plant's rotary cloth filter unit was not in operation at the time of the inspection.**

**RESPONSE:** It is correct that the cloth filter unit was not in operation at the time of the inspection. Efforts are being made to obtain a cloth filter, although they are difficult to obtain (as are any replacement parts for the filter unit). Presuming one can be obtained, it will be installed and the filter will be cleaned as appropriate to remove solids.

**OBSERVATION 6: The Inspectors observed the UV transmittance indicator was flashing at the time of the inspection and read 0.9 mW/cm<sup>2</sup>. It was unclear if it was functioning properly.**

**RESPONSE:** We have communicated with the manufacturer of the sensors on the UV equipment, and they confirmed that the flashing is an indication that fouling may be present on the UV lamp sleeves. The flashing serves as an indication that the operator should review for fouling, and Singh Operational Services will do this and address any identified issues. Moreover, since the inspection, we replaced the lamp sleeve kit and ballast at Boone's Estates, and the unit is operating as designed. A copy of the receipt for this equipment is attached as Exhibit 2.

**OBSERVATION 7: The Plant did not have an operations and maintenance (O&M) manual on site at the time of the inspection.**

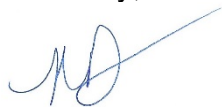
**RESPONSE:** Singh Operational Services, Inc. is in the process of drafting an O&M manual for the WWTP. We will provide a copy of the O&M manual to the MDE and EPA upon completion.

**OBSERVATION 8: The Plant averaged within 80 percent of the design flow (i.e. 64,000 gallons per day (GPD)) 22 times during the most recent three-year reporting period and higher than the design flow 9 times during that period.**

**RESPONSE:** The discussion of this observation in the EPA inspection report states that the MDE representative on-site during the inspection indicated that no Wastewater Flow Capacity Report had been submitted. That is not correct, as by letter dated October 19, 2020, Mill Brook Engineering, LLC, on behalf of Boone's Estates MHC, LLC, submitted a Wastewater Capacity Management Plan and associated Flow Capacity Report forms to the MDE (copy attached as Exhibit 3).

We hope the foregoing information is helpful to EPA, and we remain available to answer any further questions. If a further technical meeting would be helpful, we can certainly schedule that as well. Thank you for your time and consideration.

Sincerely,



Boone's Estates MHC, LLC  
Rikki Drykerman, General Counsel

Mr. Mark Zolandz  
U.S. Environmental Protection Agency  
February 17, 2021  
Page 4

Atts.: Exhibit 1 - Photos  
Exhibit 2 – Invoice  
Exhibit 3 – October 2020 WCFR

cc: Shailaja Polasi (MDE)

## **EXHIBIT 1**













## **EXHIBIT 2**

Singh Operational Services, Inc.

4360 Powellville Road  
Pittsville, MD 21850

Phone # 717-464-7395

E-mail lwalrath@singh-ops.com

# Invoice

Date	Invoice #
1/22/2021	18693

## Bill To

Horizon Land Management  
Boones Estates MHC, LLC WWTP & WTP

P.O. No.	Terms	Due Date		
	Net 30	2/21/2021		
Description		Qty	Rate	Amount
331014-002 Lamp Sleeve Kit, 64" PTP/3B		2	406.18	812.36
302403 Ballast 120V/60 HZ		1	331.04	331.04
Service Technician Labor Approximate		1	460.00	460.00
Trojan UV Freight			35.35	35.35
All part and labor above were for Troajn UV Work by Heyward at Boones Estates MHC WWTP.				

PLEASE REMIT PAYMENTS TO:  
4360 POWELLVILLE RD.  
PITTSVILLE, MD 21850

## **EXHIBIT 3**

**MILL BROOK  
ENGINEERING, LLC**

PO Box 966  
Dover, DE 19903

302.312.4716

MILLBROOKEENG.COM

**AFFILIATED OFFICES:**

ROYERSFORD, PA  
STATE COLLEGE, PA  
TUNKHANNOCK, PA

October 19, 2020

Shailaja Polasi  
Maryland Department of Environment  
Water and Science Administration  
Compliance Program  
1800 Washington Blvd  
Baltimore, MD 21230

**RE: Boone's Mobile Estates WWTP – Permit DP-0191  
Wastewater Capacity Management Plan**

Dear Ms. Polasi:

Mill Brook Engineering (Mill Brook) is assisting our client, Boone's Mobile Estates, Inc. (Boone's), with the Wastewater Capacity Management Plan (WCMP) for Boone's Mobile Home Estates. The site is currently classified as "noncompliance" with respect to the NDPS Municipal Minor Surface Water Discharge Permit. This WCMP is being completed following your July 21, 2020 inspection report.

The enclosed WCMP is for the year ending 2020 and includes the average flow data for 2017, 2018, 2019, and 2020. Our office compiled the three-year flow data from previously submitted DMR's and compiled the enclosed spreadsheet showing the monthly averages as well as the yearly and three-year averages for the plant. The average flow for 2017 was significantly lower than more recent years so it was not included in the three-year average flow. We have attached enclosures to facilitate your review of the materials as noted below.

At this time, there is no data for Inflow and Infiltration (I&I). The data in the WCMP represent the plant effluent data only. An I&I analysis is in progress to be completed in 2021.

At this time, an expansion of the plant is not required as the existing flow remains approximately 89% of the permitted discharge as indicated by the calculations in the WCMP. There are no additional units proposed and the build out of the community is already complete as currently permitted. The community is undergoing an I&I analysis to attempt to mitigate any unnecessary inflows to the wastewater system.

Please let us know if you have any questions or concerns.

Sincerely,

Michaelena Hayes, P.E.

CC: Boone's Mobile Estates, Inc.  
Lyla Walrath, Singh Operational Services, Inc.

**Enclosures:**

- Three-Year Flow Data
- Worksheet Form-1
- Municipal Sewage Form

# MUNICIPAL SEWAGE FLOW CAPACITY REPORT

## REPORTING

First report due January 31, 2005 for all of calendar year 2004 to establish a current "base line" for WWTPs at or exceeding 75% of permitted capacity.

WWTP under Consent Order with EPA/DOJ and/or MDE or

NPDES Permit Renewal

Date of this report: \_\_\_\_\_

Facility Name: \_\_\_\_\_

Permit issued to: \_\_\_\_\_

County where plant is located: \_\_\_\_\_

NPDES discharge permit number: \_\_\_\_\_

State discharge permit number: \_\_\_\_\_

Facility address: \_\_\_\_\_

Name/title of individual completing form: \_\_\_\_\_

Name/title or position of person certifying this form: \_\_\_\_\_

Contact person's name and telephone number: \_\_\_\_\_

Mailing address if different from facility address: \_\_\_\_\_

## QUESTIONS

1 Rated/Design Flow (MGD) \_\_\_\_\_ Current Permitted Flow (MGD) = \_\_\_\_\_ MGD

2 Annual average flow in MGD for each of the three (3) complete previous calendar years:

(-For Calendar Year \_\_\_\_\_) \_\_\_\_\_ MGD

(-For Calendar Year \_\_\_\_\_) \_\_\_\_\_ MGD

(-For Calendar Year \_\_\_\_\_) \_\_\_\_\_ MGD

**3-Year Average Flow (MGD) = \_\_\_\_\_ MGD**

3 Gallons and EDUs used to determine the flow contribution for building permits issued per structure: (Ex: 250 gallons per EDU: 100 gpcd X 2.5 persons per dwelling): \_\_\_\_\_ GPD/EDU

4 Number of S-1 building permits currently approved but not connected to the WWTP:

Residential = \_\_\_\_\_ Units

Commercial = \_\_\_\_\_ Units

Institutional = \_\_\_\_\_ Units

Industrial = \_\_\_\_\_ Units

Total = \_\_\_\_\_ Units

5 Total amount of additional flow represented by approved S-1 building permits that have not been connected to date: (actual flow pending on a period of time and estimated flow based on Town Master Plan): \_\_\_\_\_ MGD

6 Potential flow when the flow from approved S-1 building permits (not connected) is added to the actual annual average plant flow in MGD for the last three (3) complete years: \_\_\_\_\_ MGD



## MUNICIPAL SEWAGE FLOW CAPACITY REPORT, Continued

7	Number of residential lots on approved S-1 record plats that have not applied for building permits (when recorded lots apply for permits, they must be subtracted from the record plat totals so as to not double count): _____ Units  Flow rate per EDU: _____ GPD/EDU  Associated Flow: _____ MGD					
8	Number of commercial lots on approved S-1 record plats that have not applied for building permits: _____ Units  Associated Flow: _____ MGD					
9	Sum of three-year average annual flow (#2), S1 building permits flow (#5) and prospective S1 record plat flow (#7): _____ MGD					
10	Were there any effluent violations, overflows, bypasses, and causes reported to MDE (DMRs, Violation Notices and 5-day Letters) associated with excessive flow at the WWTP and/or with the sewer system(s) that occurred during this reporting period? _____ YES, _____ NO					
11	Are there any planned WWTPs or sewer system upgrades, expansions, or improvements decided on during this reporting period? _____ YES, _____ NO If YES, Completion Date: _____ Impact to flow and flow capacity: _____ MGD					
12	Number of proposed future connections (S-2 & S-3) during this reporting period: _____ Units					
13	Amount of additional flow represented by proposed future connections (S-2 & S-3) described above: _____ MGD					
14	Available treatment plant flow capacity remaining upon completion of proposed future connections (S-2 & S-3) described above: _____ MGD					
15	Do flows from future connections and existing flow exceed determined flow? _____ YES, _____ NO					
16	Are there any moratoriums or limitations on new building permit approvals currently in place?  _____ YES, _____ NO  Date enacted: _____ Expiration date: _____					
17	What is the "ultimate" flow capacity required if "build-out" of the town/city would occur based on the latest approved land use/zoning in the adopted master plan (as amended) for this reporting period? _____ MGD					
<b>SIGNATURE</b>						
<table style="width: 100%; border: none;"> <tr> <td style="width: 35%; vertical-align: top;">ENGINEER, FACILITY MANAGER or DESIGNEE</td> <td style="width: 65%;">                             Name: _____                               Title: _____                               Date: _____                         </td> </tr> <tr> <td style="vertical-align: top;">PERMITTEE, OWNER/OPERATOR, COUNTY/CITY ELECTED OFFICIAL</td> <td>                             Name: _____                               Title: _____                               Date: _____                         </td> </tr> </table>			ENGINEER, FACILITY MANAGER or DESIGNEE	Name: _____  Title: _____  Date: _____	PERMITTEE, OWNER/OPERATOR, COUNTY/CITY ELECTED OFFICIAL	Name: _____  Title: _____  Date: _____
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**Figure 1: Worksheet Style One**

Estimated Wastewater Plant Flow for YEAR: \_\_\_\_\_, REPORT DATE: \_\_\_\_\_

NAME OF FACILITY: \_\_\_\_\_

NPDES Permit Number: \_\_\_\_\_, State Permit Number: \_\_\_\_\_

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Boone's Creek  
Summary Flow Values - Table

By: LAV  
Checked By: MMH  
Date: 10/14/2020

	Flow gal/day (average)
<b>2017</b>	
January	57,000
February	52,000
March	
April	56,000
May	59,000
June	54,000
July	61,000
August	69,000
September	65,000
October	60,000
November	56,000
December	56,000
<b>Average</b>	<b>58,636</b>
<b>2018</b>	
January	60,000
February	62,000
March	55,000
April	55,000
May	68,000
June	68,000
July	75,000
August	66,000
September	69,000
October	70,000
November	77,000
December	83,000
<b>Average</b>	<b>67,333</b>
<b>2019</b>	
January	97,000
February	83,000
March	82,000
April	76,000
May	84,000
June	82,000
July	60,000
August	71,000
September	60,000
October	61,000
November	56,000
December	57,000
<b>Average</b>	<b>72,417</b>
<b>2020</b>	
January	65,000
February	56,129
March	60,871
April	72,907
May	71,381
June	85,800
July	92,200
August	90,200
<b>Average</b>	<b>74,311</b>
Overall <b>AVERAGE</b>	<b>68,475</b>
<b>Average 2018- 2020</b>	<b>70,984</b>

Notes:

1. Data represents measured flow through the existing WWTF
2. Data is extracted from DMR Monthly Reports for the facility from Jan 2017 - Aug 2020
3. Based on MDE Capacity Management Plan Guidance, existing flow should be based on average of past 3 years. Therefore, since there seems to be a general increase in flow, the average is based on all of 2018, 2019, and available data for 2020.

Table-1